BRIEF OF THE ASSOCIATION OF UNIVERSITIES AND COLLEGES OF CANADA
TO THE MINISTER OF CONSUMER AND CORPORATE AFFAIRS, CANADA
ON THE KEYES-BRUNET PAPER ENTITLED
COPYRIGHT IN CANADA - PROPOSALS FOR REVISION OF THE LAW

It is the purpose of this brief to present a university[1] response to the recommendations in Copyright in Canada - Proposals for a Revision of the Law, prepared by A.A. Keyes and C. Brunet for the Minister of Consumer and Corporate Affairs Canada.

The present brief will not attempt to provide an exhaustive discussion of the entire discussion paper; rather it will record comments on those sections which are of particular concern to the university. The AUCC task force has taken note of the philosophical changes embodied in the proposals for revision, and, in general, approves these changes. The proposed revisions may, however, create certain difficulties, and these will be discussed in paragraphs below. Where no issue is raised, it may be understood that the task force is in agreement with the recommendations.

The main thrust of the new copyright law is obviously to achieve a more just balance between the interests of copyright owners, who seek a greater protection of, and an increase in the financial returns from, their works, and those of copyright users, who desire greater access to the works, with a minimum of interference. The university is intimately concerned with the problem of reconciling these different interests, since it is both a copyright proprietor and a major consumer of copyright materials.

There is an important consideration which must be given due weight in the search for that compromise. It is that in the modern western world, most creative activity is made possible by society itself, in the form of educational services, research grants to authors, study-leaves, subsidized libraries and their services, grants to publishers,

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[1] This term is not used to refer to any one university, but to universities in general.

producers, theatre companies, and so on. Donald Savage has recently quoted with approval the C.A.U.T.-A.C.T.R.A. 1972 Brief to the effect that 'The needs of the creator are paramount, not because he is more virtuous, but because he comes first in a process. He must create before that creation can be used and enjoyed, and make its contribution to our lives.'[2] It is not a mere quibble to point out that the creator is not first in the process; the society which formed him, educated him, and now sustains him has a prior role, and this too engenders rights which must not be wholly subordinated to those of the creator. In the complex modern society it is just and necessary that the educational function should be recognized as exercising in this area one of the rights inherent in society as a whole.

The fundamental basis on which university consideration of the subject of copyright must build is that universities have a primary interest in the freedom of knowledge and in the maximum flow of ideas, impeded by as few restrictions as possible. There is a 'right to know'. This general principle must be affirmed in face of pressures to obtain that greater protection of the proprietorial rights which the new copyright law seeks to provide. It must be recognized that the processes of information exchange have been greatly accelerated through the increasing use of new technologies. Any new regulations which would attempt to limit present teaching and research practices, or inhibit the adoption of further new techniques, would be retrograde and harmful to society as a whole. The new law will undoubtedly attempt a compromise, but it is important that the desirability of the free flow of information should be clearly stated at the outset.

For purposes of responding to the new law, the university may be recognized as having three aspects: the administration, which, as a legal entity, may be subject to suits; a body of scholars, whose task is the pursuit and propagation of knowledge; and students, who have legitimate needs which society should seek to satisfy as competently as possible, and who also acquire certain rights upon payment of their fees. Since the law

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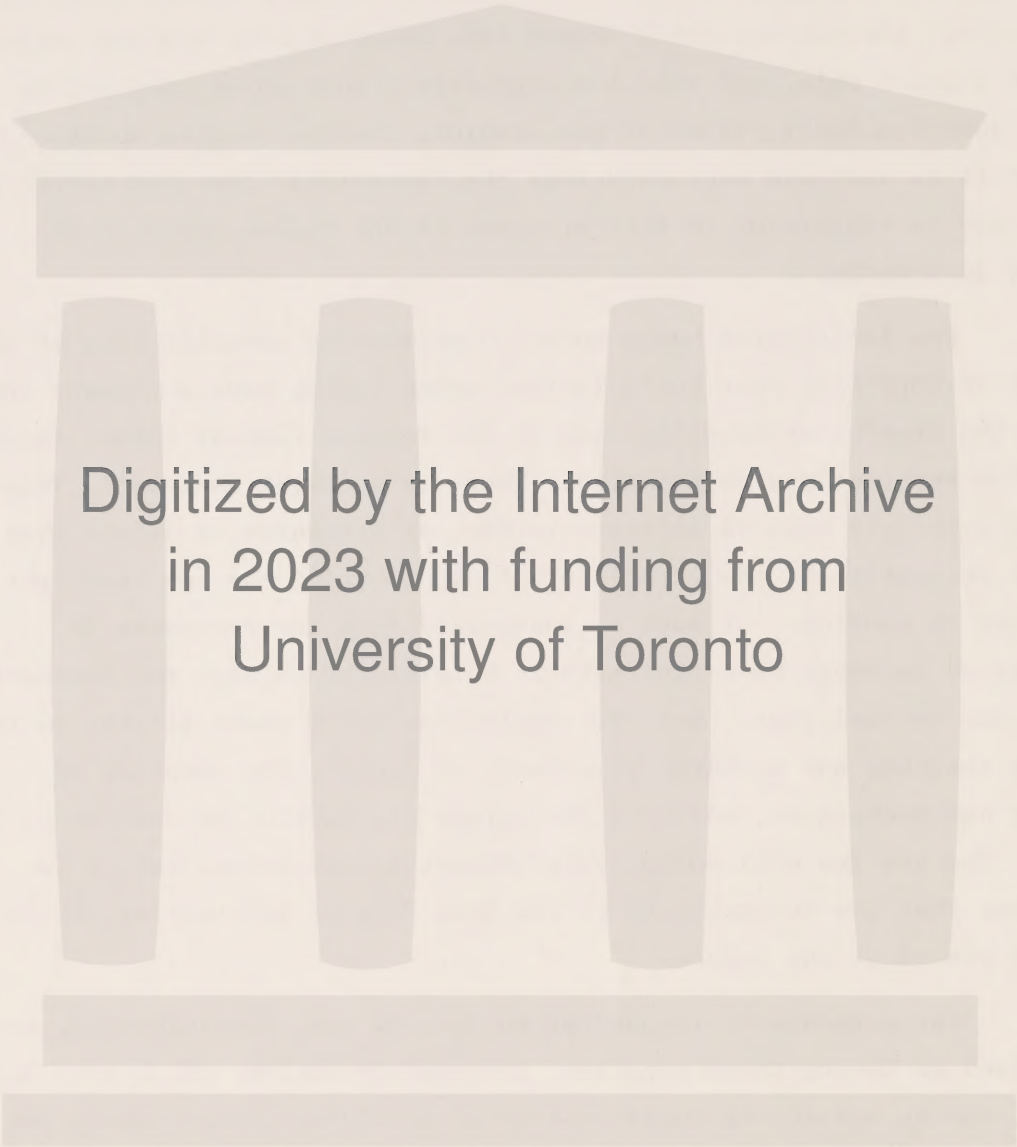
[2]Donald C. Savage, 'Who Owns Your Book, Film or Videotape? C.A.U.T. and Copyright', Canadian Association of University Teachers Bulletin, December 1977, p. 14.



can affect each group differently, the university may from time to time have to change its stance on the proposed revisions as these different interests may appear to be affected.

The response of the task force has been arranged under four themes:

A. Recognition of Copyrights
B. The Special Position of Educational Institutions
C. Enforcement of the Act
D. Appendix

A. RECOGNITION OF COPYRIGHTS

The task force wishes to draw attention to four areas of concern relating to the recognition of copyrights: the term of protection, ownership of copyright, compulsory licensing and cinematographic works.

1. Term of Protection

The task force is in agreement with the term of protection proposed for the individual copyright owner. It suggests, however, that more detail should be provided in the recommendation (No. 2, p. 65) dealing with corporate owners and employers, such as a university. The recommendation (that relevant variations of the rule applying to individual owners be made to adapt it to those cases where the owner is a corporation) is deficient in that it does not include a description of what those variations should be. The task force suggests that 50 years after the date of publication would be an appropriate term of protection in the case of a corporate owner. It is difficult to think of circumstances in which a longer term would be justified.

Also questioned was the recommendation (p. 65) that the term of protection on works unpublished at the time of the author's death be 100 years after his death in those cases where the work has been deposited in an archives. The task force holds that the present terms proposed are unnecessarily long and would cut scholars and researchers off from material they need. It is recommended instead that unpublished material should be released 30 years after the date of deposit in the archives, in line with present archival practices.

2. Ownership of Copyright

The task force advises that the recommendation (No. 4, p. 71) 'that the employer is the first owner of the copyright in works made by his employees in the course of their employment' be amended to provide for the possibility of the parties entering into a contract which specifies a different arrangement, because of the peculiar relation of the university to its professors.

Such a contract is all the more necessary in view of the opposition of some organizations to the ruling that copyright should be vested in the employer when works are produced by employees. The 1972 Report of the Canadian Association of University Teachers Committee on Copyright argued that the employee does not mortgage the product of his brain to his employer by the mere fact of employment.[3] The C.A.U.T. Committee pointed to the difficulty in deciding who owned the copyright in the case where a professor produced a work while holding teaching posts at different universities over a period of time.

In an article entitled 'ETV, Copyright and Collective Bargaining' in the C.A.U.T. Bulletin (Sept. 1974), the guidelines for the rights of faculty members producing non-print materials were given as the right to determine their form and intended use, and to receive reasonable economic return. Again the specification of these rights calls for contractual agreements.[4]

With respect to the subsequent recommendation (No. 5, p. 71), the task force approves of the idea that the copyright of an article should be transferred to the journal in which it is published in order to protect

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[3] This problem has been recognized by the English Courts. See Stevenson, Jordan and Harrison Ltd. v. Macdonald and Evans (1956), 1 TLR 101 (A.C.).

[4] Many Canadian universities follow this practice. See for example 'The Policy Statement on the Copyright of Non-Print Materials Prepared for Instructional Use'. Queen's Gazette, a Supplement to Vol. VII, No. 48 (Dec. 2, 1975), Queen's University, Kingston; 'Copyright Policy Statement' approved by the Board of Governors, University of Alberta, Edmonton, July 5, 1974; 'Copyright: University Policy on Copyright and Other Proprietary Rights', Research Policies, Office of Research Administration, University of Toronto, Toronto, January 1976.

the journal against unauthorized multiplication of the whole issue; however, further discussion is suggested for the clause that 'the author be entitled to the copyright in all other respects'. For example, should this refer to moral rights only, or also to pecuniary? Should the journal (which has put the article into print) not have some pecuniary interest also?

3. Compulsory Licensing

The recommendation in the discussion paper concerning this practice is that the section in the present act dealing with it should be repealed (top, p. 76), because no license has ever been issued under that authority. The task force suggests, however, that some form of compulsory licensing with payment be retained. The university may want to have recourse to compulsory licensing in the case of a testamentary copyright owner who is negligent in granting permission to use certain works, or where material has already been exposed to the public and is not otherwise available to educators. An example of the latter instance is the refusal of the Canadian Broadcasting Corporation to allow the university to reproduce for classroom use the material of its broadcasts made at some time other than the scheduled class hour.

4. Cinematographic works

The task force draws attention to the vagueness of the second recommendation on cinematographic works (p. 81), 'that ownership of copyright in a film rest with the "maker", defined as the person by whom the arrangements necessary to make the film were undertaken'. Confusion could result in the case where (as is normal), the arrangements are shared among a number of agencies, e.g., when a university hires a producer (from inside or outside the institution) to make a film. As protection against such misunderstanding, it is advised that the copyright of a film should be establishable by contract.

B. THE SPECIAL POSITION OF EDUCATIONAL INSTITUTIONS

Five areas where the task force believes educational institutions require special provision will be discussed: the concept of

fair dealing, the practice of photocopying, audio-visual recording, computer programs and archives. A recommendation on indirect infringement as it concerns the university will also be made.

1. Fair Dealing

A great technological advance in teaching has taken place over the last 15 years making possible the use of a wide range of materials which would otherwise not be available to the students. The task force submits that the university must not, because of the understandable desire to protect copyright interests, be precluded from making full use of these advances. This would constitute a limitation on the freedom of knowledge which is unacceptable at this stage of social advancement in Western societies.

To make this possible, either a number of exceptions should be granted to educational institutions and libraries which use copyright materials, or an extension of the 'fair dealing' principle should be sought in order to take educational uses into account (as suggested by the Government of Alberta's paper on copyright and education).[5]

One method of protecting university interests is to adopt definitions after the manner of the U.S. clarification of fair dealing in Sec. 107 of its new copyright act.[6] The task force does not agree that this matter should be left solely to determination in the courts by the processes of case law, which are likely to be slow and very costly. In the U.S. provisions for fair use of copyright material may include making copies 'for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research.' The proposed Canadian parallel (p. 149) is deficient in that it does not include the reference to classroom use. Furthermore, the U.S. guidelines for what may be deemed fair use include:

1. the purpose and character of the use, i.e., whether it is for commercial or non-profit educational purposes

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[5] 'Copyright and Education: An Alberta Position', Government of Alberta, October 3, 1977, p. 6.

[6] Public Law 94-553 which becomes effective January 1, 1978.

2. the nature of the copyright work
3. the amount of the work reproduced
4. the effect on the potential market for or value of the copyright work.

In reference to the fourth guideline, the task force points out that the use by educators of copyright material does not in the great majority of cases diminish the financial market of the copyright owner, because the works in question would otherwise simply not be used. The primary concern here must be to facilitate the free distribution of ideas.[7]

A second method of protecting university interests in reproducing copyright material, described by P.S.M. Lawn in his article 'Copyright and the University',[8] is that of paying a flat fee to a single agency which would in turn pay the copyright owners. But the difficulty of determining the appropriate size of the fee for different kinds of universities (which are no more uniform in this respect than in any other) and of grouping many diverse, often foreign, proprietors in one collective would make this a very arbitrary method.

A third method is to adopt some system of recording the number of copies made and paying a small fee for them to an appropriate collective. The cost of adapting machines and of the bureaucracy needed to organize and police such a system makes it, in the opinion of the task force, a less desirable solution. An A.U.C.C. memorandum notes that the Economic Council also disapproved of adopting this method because the cost of development would be borne by the consumer and because of the difficulties with enforcement. The task force believes that Guideline No. 4 above provides sufficient protection for financial concerns. It is stressed

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[7] For similar recommendation, see C. Vincke, P.-A. Côté and V. Nabhan, Problèmes de droit d'auteur en éducation, Centre de recherche de droit public de l'Université de Montréal, Québec. Ed. Officiel 1977, p. 59ff., and 'Copyright and Education: An Alberta Position', op. cit. p. 9.

[8] P.S.M. Lawn, 'Copyright and the University' in P. Thomas, ed., Universities and the Law, Winnipeg, Legal Research Institute of the University of Manitoba, April 1975, pp. 74-75.

that ways must be found to prevent the imposition of legal or practical obstacles to the reasonable use of new technologies in university teaching.

The task force strongly supports the proposal that the concept of fair dealing should also be applicable to the use of unpublished works in a library or archives to facilitate private research and study. Thus whereas the task force supports the position of the Canadian Library Association with respect to proposed revision of the copyright act in general, the task force urges that, on the subject of fair dealing, a stronger stance be taken to ensure the protection of university interests in the propagation of knowledge.

2. Photocopying

With regard to the specific instance of photocopying, the task force particularly disagrees with the recommendation (No. 1, p. 163), 'that photocopying not be the subject of any specific provisions'. It is dissatisfied because, in the absence of regulations, the university would be subject to vague, general ideas which would impede present practices and which might leave it open to suit for infringement. The situation of the university with respect to this valuable teaching and research tool, should be clearly protected by a statement of exemption for educational institutions. Again, fair dealing guidelines like those of the U.S. with regard to photocopying could be adopted.[9] Thus, making multiple copies of a reasonable amount of material for use in class instruction would not be considered an infringement of copyright law, provided that the copying meets the tests of reasonable brevity, spontaneity and cumulative effect, and that each copy includes a notice of copyright.

Another area where special exemption for educational institutions is needed is that related to the widespread use of self-service photocopying machines in the university. It was held that a university is liable to suit for student use of such machines in the recent Australian

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[9] Public Law 94-553, S. 108. See the American case of William and Witkins Co. V. The U.S., 1973, 487F (2d) 1345.

case of Moorhouse and Angus and Robertson, Publishers, Pty. Ltd. v. University of New South Wales, (1974) 3ALR, p. 1, and it is pointed out in the discussion paper (pp. 163-164) that Canadian law parallels Australian law closely at this point. It is clear, therefore, that similar problems could arise in Canadian jurisdictions and it is important that special provisions be made to protect universities from such suits.

3. Audio-Visual Recording

The same concept of fair dealing to facilitate the dissemination of ideas should be carried over to the use of non-print materials (tapes, records, etc.), and similar exceptions with regard to their technologies should be sought for educational institutions. A fair dealing clause should be applicable in this area so that it would be possible, for example, that one tape, (but one tape only), could be made of each record for use by students, or so that professors could record performances and replay them for the purposes of classroom instruction. The Government of Alberta paper points out that 'the taping of any program for replay to classrooms at a later date actually increases the original audience and does not in any way threaten the livelihood of any owner or participant.'[10]

4. Computer Programs

The recommendation (No. 3, p. 129), 'that there be a statutory right of discovery whereby a copyright owner may compel disclosure of whether any of his copyright material is or has been stored in an ISRS', should be strongly opposed. The recommendation does not take into account the realities of the position of the computer owner who is not, and from the nature of the technology cannot be, responsible for what goes into the computer and, therefore, is not able to disclose whether a particular program has or has not been stored in it. A general liability to disclosure would clearly be unjust, as infringing on the rights of legitimate computer users. It would, the task force suggests, be technically impossible for the owner to comply with this regulation, and morally wrong

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[10] 'Copyright and Education: An Alberta Position', op. cit., p. 9.

to seek means of compelling him to do so. It is advised that this recommendation and the one following and dependent on it should not be accepted.

5. Archives

The recommendation (top, p. 175), 'that no statutory exception be provided to libraries and archives with respect to copyright material deposited therein, other than to permit the making of a copy for the sole purpose of preserving the material which is deteriorating or damaged', should be broadened. The task force believes that librarians and archivists should be permitted to make a sufficient number of copies to safeguard and preserve original materials, and preferably before the materials begin deteriorating, or are damaged or stolen.

The recommendation (No. 3, p. 176) that the Copyright Tribunal should have the sole discretionary power to issue a non-exclusive license is in the task force's opinion too limited. The library also should have the discretionary power to allow certain individuals to use copyright materials and to refuse others. The recommendation should differentiate between use of copyright works for criticism, quotation and other research purposes in which case the library should have the authority to give permission, and the use of the works for commercial purposes, in which case it is best left to the decision of the Copyright Tribunal.

6. Indirect Infringement

At present, an indirect infringement occurs when a person unlawfully permits the public performance of a work for private profit, 'unless he was not aware, and had no reasonable ground for suspecting, that the performance would be an infringement of copyright'. The proposed revision removes the 'unless' clause (Recommendation 2, p. 177), thus making the proprietor of the premises used for the public performance of protected material fully responsible. Without that clause, the university may be put in the position of an unknowing infringer, since it frequently allows student organizations and similar groups to use its premises for public performances. The student or similar organization is not likely to be sued, but the university might well be sued as the vulnerable party in

the infringement. It is suggested, then, that the clause not be deleted from the regulation, or that an exception be made in the case of educational institutions and their student organizations in this matter.

C. ENFORCEMENT OF THE ACT

The task force strongly recommends that before the proposal to create collectives for the protection of copyright be considered, the composition and powers of collectives and of the Copyright Tribunal which would regulate them should be clearly outlined. If the proposal is accepted, the formation of such collectives should be regulated by law, and their powers to take action should be limited to well defined situations. The Government of Alberta[11] recommends that the Council of Ministers of Education sponsor a 'voluntary user collective' which would collaborate with owners' collectives on the guidelines for use of materials, fees, and other matters in the field of education. If the plea for the general exemption of educational institutions from the regulations with regard to infringement is not accepted, then faute de mieux, the task force would support this proposal. But it again draws attention to the expense involved in collecting comparatively small sums of money. If the sums of money involved are not small, the arguments used earlier are all the stronger.

The task force strongly urges that the interests of educational institutions be specially represented on any Copyright Tribunal, possibly through provincial channels as suggested in the document by the Alberta Government. The Council of Ministers of Education should be consulted on the Tribunal's structure and particularly on its powers of regulating educational activities with regard to copyright.

CONCLUSION

In summary, the task force recognizes the need for a revision of the present act. It endorses the position that Canada should not enter into international agreements beyond the point necessary to protect Canadian interests in other countries. The university as the home of much

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[11] 'Copyright and Education: An Alberta Position', op. cit., p. 10.

creative endeavour must always have a concern for the protection of the rights which inhere in literary, musical, artistic and dramatic works. But the task force is very strongly of the opinion that the present proposals do not sufficiently recognize the non-profit, socially-beneficial nature of schools and universities or the extent to which new technologies have changed the character of university and college teaching.

APPENDIX

The Current Use of Photocopying as a Teaching Aid

The 1960's witnessed a great expansion of Canadian universities: approximately 275,000 more students were enrolled in 1972 than in 1962, an increase of almost 41%. With a class size of 40 or so, it was still possible to put a small number of library books 'on reserve' for limited-time access, but when the classes became 200 or 300, or even a thousand strong, this practice became inadequate. But with the new need for readily available material in large quantities came a new technology, that of photocopying. It must be recognized that copying techniques have played a role of major significance in the changes which contemporary teaching methods have undergone.

It is now customary in many universities, and probably in all of the larger ones, for many students to receive week-by-week hand-outs of required reading material for which they generally pay small sums to cover photocopying costs. The teaching of Law, for example, depends very greatly on the evolution of 'casebooks' which represent a particular instructor's anthology of relevant materials, most of which are perhaps not under copyright, although a great deal may be. In Engineering, graphs, diagrams, tables, instruction manuals for laboratory equipment, and sets of problems and solutions are frequently adapted and copied for student use in specialized areas.

Some of the main advantages of copying practices quoted by professors are:

1. Students who are unable to meet the rising costs of books are able to use and appreciate works which would otherwise be out of their reach.

2. Each student has fair and equal access to the most important parts of required reading, despite restrictions which are inevitable in any library.

3. Materials not normally available from a library and which therefore would not be otherwise accessible can be made available to all, e.g., articles in obscure journals, pages of 'rare' books (i.e. market-costly books only available to senior scholars), pages of books out of print or of unpublished manuscripts.

4. Where a large class is sectioned and receives lectures from different lecturers, the content of the course is kept within acceptable bounds of uniformity.

5. Fewer collections of articles, fewer anthologies of writings by authors from the past (particularly relatively obscure ones) and fewer reprint editions are being published than in the past. It is no longer so financially attractive as it used to be for publishers to keep books in print. To a considerable degree, the practice of photocopying has compensated for these shortcomings.

In a typical situation the teaching materials are assembled by a professor in his or her office from books taken from the library, but also from other personally-gathered materials to which he alone has access. Thus, the use of photocopying permits a professor to create an anthology of examples or supporting materials shaped around his or her own particular insights. Anthologies of poetic examples from different times can be assembled from a multitude of books and used effectively with a class; or a series of philosophical selections can be assembled on a single point in such a way as to underline the analysis and criticism of the lecturer. It is contended that this practice has greatly facilitated the art of teaching by allowing the personality and expertise of the professor to be more freely and effectively expressed. In the past, it was often counter-productive to mention some authors and their work simply because they could not be made accessible to students. Now examples can be made readily available to all the members of the class. In the hands of a good teacher, the new techniques have undoubtedly enriched the processes of criticism and exposition. Under the proposed new copyright act, the danger is not so much that a professor or a university might be successfully sued for use of copyright materials in class, but that they might be inhibited from taking advantage of the new possibilities for fear of being sued.

It should be recognized that there is considerable difference between the character of photocopying in the various teaching departments and photocopying in the library, with which the discussion paper mainly deals. However, Bernard Katz, in his article 'Copyright or Copy Wrong', C.A.U.T. Bulletin, December 1977, makes a point which is valid for both situations. Quoting studies conducted by B. Stuart-Stubbs in 1969 and by R.H. Blackburn in 1970, he points out that the vast bulk of library photocopying is of single items, rather than of multiple copies, and that the Canadian content of the sizable volume of library-copying is relatively small, so that financial recompense, if instituted, would go for the most part to benefit foreign authors and publishers. This would be equally true for multiple photocopying for classroom use.

So far the subject has been that of copying documents and printed materials. The audio-visual technologies present their own but closely-related problems. Whereas printed materials can be and are readily reproduced, and teaching and criticism can thereby be carried forward effectively, these same functions in the area of film and audio-visuals are seriously inhibited because here the copyright ownership is much more stringently enforced.

A teacher in this field made the following points:

1. Films and video-tapes are now essential in many areas of teaching, and are indispensible in the study of the media themselves, but the rental charges and the sales costs of such materials are becoming prohibitive. For example, two video-cassettes of a 1½ hour film could cost $3,000.00, and yet the university may be unable to buy a print of the film even at that price because the distributors find it more lucrative to rent.

2. Similarly, still and tape portions of films and T.V. materials are required for critical studies in these areas.

3. Students doing exercises in audio-visual presentations need to be able to make collages, a practice which may frequently involve infringement of copyright.

4. News and public affairs present a special problem. Although now protected by copyright, this extremely important source of current history ought to be regarded as being in the public domain. For example,

during the 1970 October crisis, McGill students made an excellent video tape on the subject, which was in fact an anthology of material taped from radio and television. But this tape could not be used in subsequent teaching because of copyright and protection of image.

In summation, the points to be made are that the use of the available photocopying processes has greatly facilitated teaching generally. Therefore these processes should not be hindered more than is demonstrably necessary. Secondly, that if the same defence of fair dealing for which the task force has argued with respect to the copying of printed materials were to be made applicable to the copying of audio-visual material in an educational situation, the teaching in these areas would be greatly improved and the creative endeavour in these subjects would be supported and encouraged. Thirdly, the task force argues that in none of these areas would either the creative scholar/artist or the producer/publisher suffer great pecuniary loss, but both would benefit from the increased social significance given to their activities by the interest generated by courses given to successive generations of university students.

RECOMMENDATIONS

1. That unpublished material be released 30 years after the date of deposit in the archives, in line with present archival practices. (p. 3).

2. That the recommendation (No. 4, p. 71) 'that the employer is the first owner of the copyright in works made by his employees in the course of their employment' be amended to provide for the possibility of the parties entering into a contract which specifies a different arrangement, because of the peculiar relation of the university to its professors. (p. 4)

3. That some form of compulsory licensing with payment be retained. (p. 5)

4. That copyright of a film be establishable by contract. (p. 5)

5. That ways be found to prevent the imposition of legal or practical obstacles to the reasonable use of technologies in university teaching. (pp. 7-8)

6. That, on the subject of fair dealing, a stronger stance be taken to ensure the protection of university interests in the propagation of knowledge. (p. 8)

7. That the situation of the university with respect to photocopying be clearly protected by a statement of exemption for educational institutions. (p. 8)

8. That special exemption for educational institutions be provided with respect to the widespread use of self-service photocopying machines in the university. (p. 8)

9. That special exemption for educational institutions be provided with respect to the technologies related to non-print materials. (p. 9)

10. That the recommendation (No. 3, p. 129) 'that there be a statutory right of discovery whereby a copyright owner may compel disclosure of whether any of his copyright material is or has been stored in an ISRS', and the recommendation following and dependent on it, not be accepted. (p. 9)

11. That the recommendation (top, p. 175) 'that no statutory exception be provided to libraries and archives with respect to copyright material deposited therein, other than to permit the making of a copy for the sole purpose of preserving the material which is deteriorating or damaged' be broadened to enable librarians and archivists to make a sufficient number of copies to safeguard and preserve original materials. (p. 10)

12. That the recommendation (No. 3, p. 176) that the Copyright Tribunal should have the sole discretionary power to issue a non-exclusive license be broadened to give a library the discretionary power to allow certain individuals to use copyright materials and to refuse others. (p. 10)

13. That the 'unless' clause (recommendation 2, p. 177) not be deleted from the regulation, or that an exception be made in the case of educational institutions and their student organizations in this matter. (pp. 10-11)

14. That, before the proposal to create collectives for the protection of copyright is considered, the composition and powers of collectives and of the Copyright Tribunal which would regulate them be clearly outlined. (p. 11)

15. That the interests of educational institutions be specially represented on any Copyright Tribunal. (p. 11)

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